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September 20, 2007

Honorable Deborah A. Batts United States District Judge United States Courthouse 500 Pearl Street New York, NY 10007

MEMO ENDORSED

USDC SDNY

Re:

United States v. FNU LNU and Leobardo Cisneros-Magana 07-Cr-482 (DAB)

Dear Judge Batts:

Our office represents Leobardo Cisneros-Magana in the above matter. The case is scheduled for conference on September 24, 2007, at 10:30 a.m.

I write to request an adjournment of this conference, so that defense counsel can have additional time to review the extensive discovery in this case. The government has provided my office with ten CD-Roms containing consensually recorded telephone calls and in person meetings, as well as surveillance photos. The phone calls are mostly in Spanish.

S. Michael Musa-Obregon, counsel for lead defendant FNU LNU, and A.U.S.A. Rua M. Kelly join me in this application.

OCT. 29, 2007 The defense consents to the exclusion of time from September 24, 2007 to the next conference date, pursuant to 18 U.S.C. § 3161(h)(8), which permits a district court to grant a continuance and exclude the resulting delay if the ends of justice served by granting the continuance outweigh the public's and the defendant's interests in a speedy trial, which is the case here.

OCT. 29, ZOOT at HAM

I suggest anytime on October 15, or after 11 a.m. on October 16, if those days are convenient for the Court.

Very truly yours,

AVROM ROBIN

Cc: A.U.S.A. Rua M. Kelly

S. Michael Musa-Obregon, Esq.

SO ORDERED

UNITED STATES DISTRICT JUDGE

